

PATENT
ROC920030090US1**REMARKS**

Claims 1-34 are currently pending. Claims 1, 2, and 18 have been amended. Claims 1 and 18 are the only pending independent claims.

35 U.S.C. §102(b) Rejection

The Office Action rejected claims 1 to 34 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent Application No. US 2001/0011338 to Bonola (hereinafter "*Bonola*"). As will be discussed below, Applicants respectfully traverse the rejection and assert that claims 1 to 34 are patentable over the cited reference.

Applicants' claims recite determining whether a free group entry of a size required by a portion of data exists in a section of a memory. Applicants' specification (particularly Fig. 3 and the associated text at page 8, lines 12 to 18) makes it clear that allocated memory is first searched before resorting to unallocated memory. The Applicants respectfully submit that *Bonola* does not disclose this feature. At most, *Bonola* discloses a system and method of determining an address of an appropriately sized region of unallocated memory for an application. However, *Bonola* does not disclose determining whether a free group entry of a size required by a portion of a set of data exists in allocated memory. Therefore, Applicants respectfully request withdrawal of the Section 102 rejection based upon this distinction.

Regardless of the above and solely to expedite prosecution, Applicants have amended the independent claims to merely make explicit what was already clearly implicit. Namely, claim 1 has been amended to clearly recite a method comprising, among other features, determining whether a free

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group entry of a size required by a portion of a set of data exists in "allocated memory." As indicated above, the Applicants assert that *Bonola* does not disclose this feature. In other words, *Bonola* does not disclose determining whether a free group entry of a size required by a portion of a set of data exists in allocated memory. As such, the Applicants respectfully submit that claim 1 is not anticipated by *Bonola* and the Applicants respectfully request that the rejection be withdrawn. Similarly, Applicants assert that claims 2 to 17, which depend from claim 1, are patentable for at least the same reasons.

Likewise, claim 18 has also been amended to recite an apparatus comprising, among other features, dynamic allocation logic adapted to determine whether a free group entry of a size required by a portion of a set of data exists in "allocated memory." As previously discussed, *Bonola* discloses a system which determines an address of an appropriately sized region of unallocated memory for an application. However, *Bonola* does not disclose a system nor an apparatus which includes dynamic logic adapted to determine whether a free group entry of a size required by a portion of a set of data exists in "allocated memory." Accordingly, claim 18 is patentable over *Bonola* and the Applicants request that the rejection be withdrawn. Similarly, Applicants assert that claims 19 to 34, which depend from claim 18, are patentable for at least the same reasons.

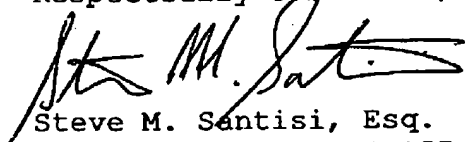
Conclusion

The Applicants believe all the pending claims are in a condition for allowance, and respectfully request reconsideration and allowance of the same.

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The Applicants do not believe any other fees are due regarding this amendment. If any additional fees are required, however, please charge Deposit Account No. 04-1696. The Applicants encourage the Examiner to telephone the Applicants' attorney at the number listed below to discuss the amendment should any issues remain.

Respectfully submitted,



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